

DECLARATION OF LUPE TORRES ON BEHALF OF PLAINTIFFS LEAGUE OF UNITED LATIN AMERICAN CITIZENS (“LULAC”) AND TEXAS LULAC

I, Lupe Torres, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am the State Director for Texas LULAC. The testimony set forth in this Declaration is based on first-hand knowledge, about which I could and would testify competently in open Court if called upon to do so.

2. LULAC is the nation’s oldest and largest national Latino civil rights organization. LULAC works to advance the economic condition, educational attainment, political influence, health, and civil rights, including voting rights, of the Hispanic and Latino population of the United States.

3. LULAC is a nonprofit membership organization, incorporated under the laws of the State of Texas, with presence in most of the fifty states and Puerto Rico. It was founded in 1929 in Corpus Christi, Texas.

4. Plaintiff Texas League of United Latin American Citizens (“Texas LULAC”) is the Texas chapter of LULAC. LULAC has over 14,000 members in Texas. Texas LULAC has chapters in most Texas counties, and has individual members who reside and vote in every Texas county.

5. Texas LULAC conducts voter registration activities throughout Texas. Voter registration activity is key to Texas LULAC’s mission of increasing civic participation among its members. Texas LULAC commits time, personnel, and resources to voter registration drives throughout Texas, with efforts primarily directed at the thirty most populous counties in Texas. Texas LULAC conducts its voter registration activities year-round at various locations and events, including at high schools for newly eligible students reaching the age of 18, at shopping malls, and

festivals. Texas LULAC volunteers also sometimes assist with registering new citizens at naturalization ceremonies.

6. Texas LULAC has long represented the interests of Latinos and other minority groups in all regions of Texas. LULAC and Texas LULAC have filed numerous lawsuits on behalf of Latino voters throughout Texas and across the nation, and both organizations have been recognized and accepted as an organizational plaintiff in federal courts across the country, including the United States Supreme Court and the U.S. District Court for the Western District of Texas.

7. The voter purge program announced by Secretary Whitley's office, in combination with the statements made by Attorney General Paxton, have created widespread confusion and fear among LULAC members and the communities LULAC targets in its voter registration efforts. Members and community members have already expressed concerns to LULAC leadership and volunteers that the voter purge program could affect their voter registration status. These concerns are heightened by the uncertainty surrounding the program. LULAC has spoken with several people who are unsure whether they are on the list of voters disseminated by the Secretary of State's office, nor what steps, if any, they must take to ensure they are not removed from the voter rolls. Others have expressed concerns over whether registering to vote will subject them to a criminal investigation or will place their citizenship in jeopardy.

8. As a result, LULAC will need to divert resources to training its volunteers and educating its membership and voter registrants about the voter purge program. This includes working with newly naturalized citizens registered by LULAC to ensure they are not removed from the rolls due to outdated DPS data; and working to find and reinstate eligible voters who are removed from the rolls.

9. LULAC will also have to expend additional extra time and resources throughout its voter registration program to redress the chilling effect that the purge program will have on voter registration among the Latino community, including those who are newly naturalized. This includes addressing eligible registrants' fears that registering to vote will subject them to a criminal investigation, or could jeopardize their citizenship status.

10. In addition to the confusion and fear, eligible voters have expressed to LULAC leadership and volunteers a lack of confidence in the election system because the list released by the Secretary's office and cited by Attorney General Paxton as evidence of criminal voter fraud by non-citizens has already proven to contain hundreds of eligible citizens. As a result, LULAC will have to expend additional time and resources countering the narrative that Texas officials are intentionally trying to make it more difficult for newly naturalized and Latino citizens to vote.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and that this Declaration was prepared in Washington, D.C. on February 13, 2019.



Lupe Torres